

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	No. 15 CR 526
)	Hon. Harry D. Leinenweber
THADDEAUS JIMENEZ,)	
Defendant.)	

NOTICE OF MOTION

TO: Michelle Petersen
Assistant United States Attorney
219 S. Dearborn
Fifth Floor
Chicago, Illinois 60604

PLEASE TAKE NOTICE that on September 24, 2015, at 9:30 a.m., the undersigned will appear before Judge Harry D. Leinenweber, courtroom 1941, United States District Court for the Northern District of Illinois, 219 S. Dearborn, Chicago, Illinois and present the following motion: **Motion for Release from Solitary Confinement**, a copy of which is served upon you.

/s/ Scott J. Frankel
SCOTT J. FRANKEL
Attorney for Defendant

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PROOF OF SERVICE

SCOTT J. FRANKEL, an attorney, certifies that he served a copy of the foregoing document via the Court's CM/ECF e-filing system on September 19, 2015 on the above named individual prior to 5:00 p.m.

/s/ Scott J. Frankel _____